

1 **QUINTAIROS, PRIETO, WOOD & BOYER, P.A.**
2 Michael Ayers, Esq. (NV Bar No.10851)
3 michael.ayers@qpwblaw.com
4 Clark V. Vellis, Esq. (NV Bar 5533)
5 clark.vellis@qpwblaw.com
6 200 S. Virginia Street, 8th Floor
7 Reno, Nevada 89501
8 Telephone: 775-322-4697
9 Facsimile: 775-322-4698
10 *Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

11
12 **IN THE UNITED STATES DISTRICT COURT**
13
14 **FOR THE DISTRICT OF NEVADA**

15 AMANDA GATES,
16 Plaintiff,
17
18 v.
19 NAVIENT SOLUTIONS, LLC,
20 Defendant.

21 Case No. 2:21-CV-01025 -JAD-DJA

22 **JOINT STIPULATION AND ORDER
23 EXTENDING DEADLINE FOR
24 NAVIENT SOLUTIONS, INC., TO FILE
25 AN ANSWER OR OTHERWISE
26 RESPOND TO PLAINTIFF'S
27 COMPLAINT**

28 **(THIRD REQUEST)**

29 Plaintiff AMANDA GATES ("Plaintiff") and Defendant NAVIENT SOLUTIONS, LLC
30 f/k/a NAVIENT SOLUTIONS, INC. ("NSL"), by and through their respective counsel, stipulate
31 and agree to extend the deadline for Defendant NSL to file an answer or otherwise respond to
32 Plaintiff's Complaint (ECF No. 1.) to and including September 17, 2021.

33 On May 28, 2021, Plaintiff filed her Complaint and NSL accepted service of the
34 Complaint on June 9, 2021. The parties have been exchanging information, and based on the
35 most current information provided by NSL, Plaintiff requires time to complete additional
36 research concerning the merits of her claim as Plaintiff will either amend the Complaint or the
37 parties will resolve the action. Plaintiff has no opposition to NSL's request for an extension until
38 September 17, 2021 to file an answer or otherwise respond to Plaintiff's Complaint.

This is the third stipulation for extension of time for NSL to respond to Plaintiff's Complaint (see second request ECF No. 8) and is being made in good faith and not for purposes of undue delay. No additional requests for extensions are contemplated.

DATED this 31st day of August, 2021.

**QUINTAIROS, PRIETO, WOOD & BOYER,
P.A.**

By: /s/ Michael Ayers
Michael Ayers, Esq. (NV Bar No. 10851)
michael.ayers@qpwblaw.com
Clark V. Vellis, Esq. (NV Bar No. 5533)
clark.vellis@qpwblaw.com
200 S. Virginia Street, 8th Floor
Reno, Nevada 89501
Attorneys for Defendant
NAVIENT SOLUTIONS, LLC

DATED this 31st day of August, 2021.

FREEDOM LAW FIRM

By: /s/ Gerardo Avalos
Gerardo Avalos, Esq.
8985 S. Eastern Ave., Ste. 350
Las Vegas, Nevada 89123
Attorneys for Plaintiff
AMANDA GATES

IT IS SO ORDERED.

DATED this 2nd day of September 2021.


Daniel J. Albrechts
United States Magistrate Judge